

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

HAILONG ZHU,

Defendant.

Case No. 1:23-cr-81

GOVERNMENT’S AMENDED EXHIBIT LIST

The Government hereby files its amended exhibit list. The only changes are that Group 2 and Exhibit 3-1 have been removed.

GX #	Description	Identifier	Offered	Admitted
GROUP 1 - K.D.F Documents				
1-1	K.D.F. Telegram Chats	PHYSICAL		
1-1A	K.D.F. Selected Telegram Chats #1			
1-1B	K.D.F. Selected Telegram Chats #2			
1-1C	K.D.F. Selected Telegram Chats #3			
1-1D	K.D.F. Selected Telegram Chats #4			
1-1E	K.D.F. Selected Telegram Chats #5			
1-2	K.D.F. Wire Transfer Forms	US-00000065-69, US-00016117-161199		
1-3	K.D.F. ASX Loan Note	US-00016120		
1-4	SoFi Loan Agreement	US-00009369		
1-4A	SoFi Loan 902(11) Certification	US-00020071		
1-4B	SoFi Loan Agreement (signed)	US-00009343		
1-5	K.D.F. Wire Transfer Form	US-00016112		
GROUP 2 – <i>Intentionally Omitted</i>				
GROUP 3 - M.C. Documents				
3-1	<i>Intentionally omitted</i>			
3-2	M.C. Selected Whatsapp Chats	US-00006641, US-00006648, US-00006663		

3-3	Selected Telegram Chats	US-00006549, US-00006562, US-00006565, US-00006570, US-00006574, US-00006576, US-00006593, US-00006602, US-00006613, US-00006617,		
3-4	M.C. Platform Chat Bank Info	US-00006671		
3-5	M.C. Wire Form	US-00006324		
GROUP 4 – Y.Z. Documents				
4-1	Y.Z. Chat Screenshots—Frank	US-00019895-19899		
4-1A	Y.Z. Chat Screenshots—Frank (Translated)			
4-2	Y.Z. Chat Screenshots—FDEX	US-00019608-19612, US-00019614, US-00019613		
4-3	Y.Z. Wire Transfer Forms	US-00015592		
4-4	Y.Z. SoFi Loan Balance Screenshot	US-00019905		
4-5	Y.Z. SoFi Loan Agreement	US-00020270		
4-5A	902(11) Certification SoFi Loan Agreement	US-00020215		
GROUP 5 - iPhone 12 Pro Max (Item 1)				
5-1	iPhone 12 Pro Max (Item 1)	PHYSICAL		
5-2	iPhone 12 Pro Max (Item 1) Preliminary Device Report and User Accounts			
5-3	iPhone 12 Pro Max Notes			
5-4	iPhone 12 Pro Max Images			
5-5	iPhone 12 Pro Max Video 1	PHYSICAL		
5-6	iPhone 12 Pro Max Video Clips	PHYSICAL		
5-7	iPhone 12 Pro Max Video 2	PHYSICAL		
5-8	iPhone 12 Pro Max Video 2 Clips	PHYSICAL		
5-9	iPhone 12 Pro Max Video 3	PHYSICAL		
5-10	iPhone 12 Pro Max Video 3 Clips	PHYSICAL		
5-11	iPhone 12 Pro Max Nikki Chat	US-00016165 - PHYSICAL		
5-12	Selected Nikki Chat			
5-13	iPhone 12 Pro Max Nikki Chat 4	US-00016166 - PHYSICAL		
5-14	Selected Nikki Chat 4			
5-15	Selected Nikki Chat Embedded Photos			

GROUP 6 - iPhone 11 Pro Max (Item 10)				
6-1	iPhone 11 Pro Max (Item 10)	PHYSICAL		
6-2	iPhone 11 Pro Max (Item 10) Preliminary Device Report and User Accounts			
6-3	iPhone 11 Pro Max Video 1	PHYSICAL		
6-4	iPhone 11 Pro Max Video 1 Clips	PHYSICAL		
6-5	iPhone 11 Pro Max Video 2	PHYSICAL		
6-6	iPhone 11 Pro Max Video 1 Clips	PHYSICAL		
GROUP 7 - iPhone 13 Pro Max (Item 5)				
7-1	iPhone 13 Pro Max	PHYSICAL		
7-2	iPhone 13 Pro Max Preliminary Device Report			
7-3	iPhone 13 Pro Max Installed Applications			
7-4	iPhone 13 Pro Max User Accounts			
7-5	iPhone 13 Pro Max Notes			
7-6	iPhone 13 Pro Max Chats			
7-7	iPhone 13 Pro Max Documents			
GROUP 8 - iPhone 13 (Item 8)				
8-1	iPhone 13 (Item 8)	PHYSICAL		
8-2	iPhone 13 (Item 8) Preliminary Device Report			
8-3	iPhone 13 User Accounts			
8-4	iPhone 13 Notes			
8-5	iPhone 13 Emails			
GROUP 9 - iPhone 11 Pro Max #2 (Chicago)				
9-1	iPhone 11 Pro Max #2	PHYSICAL		
9-2	iPhone 11 Pro Max #2 GrayKey Report			
9-3	iPhone 11 Pro Max #2 User Accounts			
9-4	iPhone 11 Pro Max #2 Images			
9-5	SIM Cards	PHYSICAL		
9-6	iPhone 11 Pro Max #2 Translated WeChat Messages (Excerpt)			
9-6A	iPhone 11 Pro Max #2 WeChat Messages (Excerpt)			
9-7	iPhone 11 Pro Max #2 Video	PHYSICAL		
9-7A	iPhone 11 Pro Max #2 Video Still			
GROUP 10 - Bank of America (BofA) Documents and Records				
10-1	BofA x3881 Account Open Document	US-00001842		
10-2	<i>Intentionally Omitted</i>			
10-3	BofA x3881 Signature Card	US-00001855		

10-4	BofA x3881 Bank Statements	US-00001869		
10-4A	BofA 902(11) Certification x3881	US-00001846		
10-5	BofA x9529 Signature Card	US-00009308		
10-6	BofA x9529 Statements	US-00007726		
10-7	BofA Wire Summary Chart for 9529 and 3881	US-000016948		
10-7A	BofA 902(11) Certification x9529	US-00007771, US-00009331		
10-8	BofA x6689 Signature Card	US-00004918		
10-9	BofA x6689 Statements	US-00004920-4984 and US-00004912-4917		
10-10	BofA x6689 Statement, October 2022	US-00004984		
10-11	BofA x6689 Final Statement, November 2022	US-00004912		
10-12	BofA x2222 Credit Card Statement, Aug. to Sept. 2022	US-00005135		
10-13	<i>Intentionally Omitted</i>			
10-13A	BofA 902(11) Certification x6689 and x2222	US-00005179		
10-14	<i>Intentionally Omitted</i>			
10-14A	BofA 902(11) Certification Surveillance	US-00007771, U-00005179		
10-15	BofA Surveillance Video – Teller 12.9.22 \$19,000	US-00007795 – PHYSICAL		
10-15A	BofA Surveillance Video – Teller 12.9.22 Clip	PHYSICAL		
10-16	BofA Surveillance Video – 20221031	US-00004988 – PHYSICAL		
10-16A	BofA Surveillance Video – 20221031 Clip	PHYSICAL		
10-17	BofA Surveillance Video – 20221028	US-00004988 – PHYSICAL		
10-17A	BofA Surveillance Video – 20221028 and 20221031 Stills			
10-18	BofA TRMS			
GROUP 11 - JP Morgan Chase Documents and Records				
11-1	JPMC x3886 Signature Card	US-00002111		
11-2	JPMC x3886 Customer and IP Information	US-0002113-2159		
11-3	JPMC x3886 Statements, Sept. – Nov. 2022	US-00002160-2172		
11-3A	JPMC 902(11) Certification x3886	US-00002109		
11-4	JPMC x3886 Account Suspension Stmt	US-00002182-83		

11-5	JPMC 902(11) x3886 Acct Suspension	US-00002181		
11-6	JPMC x5581 Signature Card	US-0002002		
11-7	JPMC x5581 Customer Data and IP Information	US-00001967-2001		
11-8	JPMC x5581 Statements	US-00001961-66		
11-8A	JPMC 902(11) Certification x5581	US-00001960		
11-9	JPMC x5581 Restriction Letter	US-00001227		
11-10	JPMC Wire Forms			
11-11	JPMC List of Companies			
11-11A	JPMC 902(11) Certification Wire Forms			
GROUP 12 - U.S. Bank Documents and Records				
12-1	US Bank x4148 Signature Card	US-00005760		
12-2	US Bank x4148 Statements	US-00005764		
12-3	<i>Intentionally Omitted</i>			
12-3A	US Bank 902(11) Certification x4148	US-00005755, US-00005758		
12-4	US Bank Customer Due Diligence Operations CTA Request Form	US-00006302-04		
12-4A	US Bank 902(11) Certification CTA	US-00020004		
12-5	US Bank Surveillance Photos	US-00005750-5754		
12-5A	US Bank 902(11) Certificate Surveillance	US-00018532		
12-6	US Bank Teller Log	US-00020109		
12-6A	US Bank 902(11) Certificate Teller Log	US-00020107		
12-7	US Bank Account Closure Letter	US-00020108		
12-7A	US Bank 902(11) Certificate Account Closure	US-00020106		
12-8	CTR	US-00005756		
GROUP 13 - Wells Fargo				
13-1	Wells Fargo x6778 Account Application	US-00007821		
13-2	Wells Fargo x6778 Statements	US-00007827		
13-2A	Wells Fargo 902(11) Certification x6778	US-00007820		
GROUP 14 - East West Bank Documents and Records				
14-1	East West Bank x 9074 Account Opening Information	US-00008877		
14-2	East West Bank x 9074 Statements	US-00008881		
14-3	East West Bank x 9074 Deposits and Offsets	US-00008873		
14-3A	East West Bank 902(11)	US-00008871		
GROUP 15 - Search Materials				
15-1	Zhu Miranda Waiver			

15-2	Zhu Statement – Audio	PHYSICAL		
15-2A	Zhu Statement – Full Translation			
15-2B	Zhu Statement – Translation Excerpts			
15-3	Essex Ave Photos			
15-4	Falling Leaf Photos Group 1			
15-5	Falling Leaf Photos Group 2			
15-6	Falling Leaf Photos Group 3			
15-7	Falling Leaf Photos Group 4			
GROUP 16 - Other Investigative Material				
16-1	Bank Transaction Charts			
16-2	Simex Screenshots	US-00000991, US-00000995, US-00001004		
16-3	<i>Intentionally Omitted</i>			
16-4	Text of Wire Instructions	US-00001014		
16-5	List of Spoofed Domains	US-00001018 – PHYSICAL		
16-6	Sea Dragon Remodel Articles of Organization and Statement of Information	US-00016951-16952		
16-7	Sea Dragon Trading LLC Articles of Organization and Statement of Information	US-00016957-16958		
16-8	California Secretary of State Certification Sea Dragon Entities	US-00016954, US-00016960		
16-9	Venetian Records – Account Overview	US-00005319		
16-9A	Venetian 902(11) Certifications	US-00020110, US-00020111		
16-9B	Venetian Records – Surveillance	US-00005473		
16-10	T-Mobile Subpoena Returns for x1816	US-00005580		
16-11	T-Mobile Subscriber Records	US-00005588 – PHYSICAL		
16-11A	T-Mobile 902(11) Certification	US-00005579		
16-12	Visa Paperwork	US-00016170		
16-12A	Visa Paperwork 902(11) Certification	US-00016169		
16-13	FDIC Certificates	US-00020072-20098		
16-14	Richard Cruz Resume			
16-15	Yang Wen Resume			
16-16	Alex Liu Resume			
16-17	Leyou Li Resume			
16-18	Picture of Joseph Wong			
16-19	Picture of Joseph Wong			

Respectfully submitted,

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September 4, 2023

By: /s/

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